

Amy H. Rubin  
Federal Defenders of Eastern Washington and Idaho  
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## Attorneys for the Defendant

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON  
The Honorable THOMAS O. RICE

United States of America,

No. 2:17-CR-0182-TOR

Plaintiff,

## Motion to Continue Sentencing

DAVID BISHOP,

## Spokane - Without Oral Argument

Defendant.

November 22, 2019 @ 6:30 p.m.

## Motion to Continue Sentencing

1                   David Bishop, through counsel, Amy H. Rubin for the Federal Defenders of  
2 Eastern Washington and Idaho, respectfully moves the Court to continue Mr. Bishop's  
3 sentencing hearing from the date currently scheduled for December 3, 2019 to a late  
4 February setting.  
5

6                   The Indictment was filed on October 17, 2017. On October 31, 2017, Mr. Bishop  
7 appeared for his arraignment and was released under pretrial conditions. On September  
8 20, 2018, Mr. Bishop entered a plea of guilty to Count 2 of the Indictment and sentencing  
9 is currently scheduled for December 3, 2019.

10                  Mr. Bishop was released on strict conditions of release and is currently in complete  
11 compliance with his release conditions.  
12

### 13                   **REQUEST FOR CONTINUANCE**

14                  Counsel for Mr. Bishop respectfully requests additional time for Mr. Bishop to  
15 address medical issues and attend currently scheduled medical appointments in Bellevue,  
16 WA.

17                  Counsel for Mr. Bishop believes this information may be necessary for counsel to  
18 provide to the Court for sentencing. Thus, counsel requests more time to adequately  
19 prepare for sentencing as this information may have an effect on Mr. Bishop's sentencing.  
20

21  
22 Motion to Continue Sentencing  
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1 Assistant United States Attorney, Patrick J. Cashman was contacted regarding  
2 this request and has no objection to the request.

3 **CONCLUSION**

4  
5 Based on the foregoing, Mr. Bishop respectfully requests this matter be  
6 continued. In an effort to assist the Court with scheduling, counsel respectfully requests  
7 a sentencing date in February. Lastly, Mr. Bishop does not request a hearing on the  
8 matter unless this Court deems it necessary to have a hearing.

9  
10 Dated: November 22, 2019

11 Respectfully Submitted,

12 S/Amy H. Rubin  
13 Amy H. Rubin, GA 618349  
14 Attorneys for Bishop  
15 Federal Defenders of  
16 Eastern Washington and Idaho  
17 10 N Post Suite 700  
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19 (509) 624-7606  
20 (509) 747-3539  
21 Email: Amy\_Rubin@fd.org

22 Motion to Continue Sentencing

## **CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following: PATRICK CASHMAN, Assistant United States Attorney.

S/Amy H. Rubin  
Amy H. Rubin, GA 618349  
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